



October 24, 2007

Honorable Kevin J. Martin
Chairman
Federal Communication Commission
445 12th Street, SW
Washington DC 20334

ELECTRONIC FILING

**Re: CC Docket No. 96-45 Petition of TracFone Wireless, Inc.
For Designation as an Eligible Telecommunications Carrier**

Dear Chairman Martin and Commission:

On behalf of the members of American Association of People with Disabilities (AAPD), I write to express concern that the petition of TracFone Wireless for designation as an Eligible Telecommunications Carrier has not yet been acted upon by the Commission.

AAPD is the largest national nonprofit cross-disability member organization in the United States, dedicated to ensuring economic self-sufficiency and political empowerment for the more than 51 million Americans with disabilities. While AAPD sees accessibility and usability as critical, we believe that *affordability is essential* in provision of telecommunications service.¹ People with disabilities are among the least employed and underemployed in the United States and seek availability of all kinds of telecommunications options, including prepaid wireless services.

Prepaid wireless service is sometimes the only option for some low income consumers with disabilities who may have little or no (or bad) credit, and who may prefer not to have long-term contracts, or to not have to deal with

¹AAPD Policy Resolution On Telecommunications And Technology For Persons With Disabilities: Given that telecommunications and technology are fields that are rapidly changing, and this will impact the integration of persons with disabilities in all aspects of daily living, be it resolved that: With regard to telecommunications equipment and services, accessibility and usability are critical, and affordability is essential, for the full inclusion of persons with disabilities; and With regard to technology, barriers to usability and availability should be removed; all technologies should incorporate the concepts of accessibility and usability in design, development, production and dissemination, with the intention of making new technologies available to all persons regardless of disability. Passed unanimously by AAPD Board, June 16, 2006.

negotiating a waiver of an early termination fee when wanting to discontinue wireless service, or not want the challenge of developing a payment plan for unexpected or late fees based on misunderstanding, or not being able to read, the fine print of their wireless subscription plan.

Furthermore, we support the principles of the Universal Service Fund and, specifically, the Life-Line and Link-Up programs that help ensure a measure of connection to the public switched network for many consumers with disabilities and their families. We therefore support the availability of more eligible telecommunications carriers, such as TracFone Wireless -- who has sought ETC status for two years -- so that more persons with disabilities have the option to choose this form of wireless service. We also understand that the Commission has determined that TracFone Wireless' impact on the size of the fund -- should they become an ETC -- would be minimal.

There is little doubt that wireless phone service greatly benefits many persons with disabilities, including elderly persons, and their families. Where wireless service is often just a convenience or efficiency dynamic for persons without disabilities, in many cases, availability and use of wireless service is a significant factor in maintaining a life of independence and productivity for a person with disability.

That is, we are hearing reports that absent wireless telephony -- that is, the means to reach anyone wherever they are -- some persons with disabilities, including persons who are elderly, would be compelled to move into institutional living, which are typically more costly options for both their families and for society. We believe then, that more availability of wireless services with Life-Line and Link-Up subsidies, could be a facilitator to strengthening and lengthening independence in living for persons with disabilities.

In this filing, AAPD strongly urges approval of TracFone's petition for regulatory forbearance and ETC designation immediately.

Sincerely,

Jenifer Simpson

Jenifer Simpson

Senior Director, Telecommunications and Technology Policy

American Association of People with Disabilities (AAPD)

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